



Louis Leon <lleon@cafaroeseq.com>

Re: Chinca v. Patel

1 message

Louis Leon <lleon@cafaroeseq.com>

Wed, Jul 8, 2020 at 5:04 PM

To: Jason Mizrahi <Jason@levinepstein.com>

Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>

We spoke a couple of minutes ago. During the call, you confirmed this morning was the first time you made the request for the time-stamped complaint and that you had been advised by US Legal that it would arrive over the weekend or later than that. As I reminded you, Judge Tiscione told you at the second to last discovery conference that the time-stamped copy of the transcript was not probative because it wouldn't show where testimony had been excluded (due to you tampering with microphones). You responded that you didn't recall what the Court said about that, which is surprising to say the least. Accordingly, I reiterated that we did not consent to any extension of the deadline.

I ask that you abide by the current deadline and not continue forcing the parties to expend time and resources.

**Sincerely,
Louis M. Leon, Esq.
Associate**

Description: Doc1

108 West 39th Street, Suite 602

New York, NY 10018

Main (212) 583-7400

Fax. (212) 583-7401

LLeon@CafaroEsq.com

On Wed, Jul 8, 2020 at 4:27 PM Louis Leon <lleon@cafaroeseq.com> wrote:

Please give me 10 minutes.

Sincerely,
Louis M. Leon
Sent from my iPhone

On Jul 8, 2020, at 4:19 PM, Jason Mizrahi <Jason@levinepstein.com> wrote:

Sure. Please give me a call on my mobile.

Jason Mizrahi, Esq.

Levin-Epstein & Associates, P.C.

420 Lexington Ave., Suite 2525

New York, NY 10170

Phone: (212) 792-0048

Mobile: (301) 758-7351

Facsimile: (646) 786-3170

Email: Jason@levinepstein.com

The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error. Thank you.

From: Louis M. Leon <lleon1989@aol.com>
Sent: Wednesday, July 8, 2020 4:10 PM
To: Jason Mizrahi <Jason@levinepstein.com>
Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>
Subject: Re: Chinca v. Patel

Before I give you our final position I would like to speak on the phone about it. Because I'm not sure I understand.

Sincerely,

Louis M. Leon

Sent from my iPhone

On Jul 8, 2020, at 3:46 PM, Jason Mizrahi <Jason@levinepstein.com> wrote:

That's it. Please let me know if you consent to the extension.

Jason Mizrahi, Esq.

Levin-Epstein & Associates, P.C.

420 Lexington Ave., Suite 2525

New York, NY 10170

Phone: (212) 792-0048

Mobile: (301) 758-7351

Facsimile: (646) 786-3170

Email: Jason@levinepstein.com

The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error. Thank you.

From: Louis Leon <lleon@cafaroeseq.com>
Sent: Wednesday, July 8, 2020 3:40 PM
To: Jason Mizrahi <Jason@levinepstein.com>
Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>
Subject: Re: Chinca v. Patel

Jason:

Are there any other reasons you'd like to disclose? I think it is grossly misleading for you not to mention that from the beginning.

Sincerely,
Louis M. Leon, Esq.
Associate

Description: Doc1

108 West 39th Street, Suite 602

New York, NY 10018

Main (212) 583-7400

Fax. (212) 583-7401

LLeon@CafaroEsq.com

On Wed, Jul 8, 2020 at 3:38 PM Jason Mizrahi <Jason@levinepstein.com> wrote:

Louis,

An additional reason is that we are waiting on a time-stamped copy of the deposition transcript.

The Court Reporting agency has just advised us that the only file of the time-stamped transcript is located on a laptop that has been confiscated by the TSA. They expect the laptop to arrive back in their possession by close-of-business on Friday (7/10).

Please let me know if you are willing to consent to a short extension to, through and including, Wednesday (7/15).

Jason

Jason Mizrahi, Esq.
Levin-Epstein & Associates, P.C.
420 Lexington Ave., Suite 2525
New York, NY 10170
Phone: (212) 792-0048
Mobile: (301) 758-7351
Facsimile: (646) 786-3170
Email: Jason@levinepstein.com

The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error. Thank you.

-----Original Message-----

From: Jason Mizrahi

Sent: Wednesday, July 8, 2020 2:33 PM

To: Louis Leon <lleon@cafaro.esq.com>

Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>
Subject: RE: Chinca v. Patel

Our office has two conflicting back-to-back mediations coming up.

We are also operating on a short week due to the long holiday weekend.

Jason

Jason Mizrahi, Esq.
Levin-Epstein & Associates, P.C.
420 Lexington Ave., Suite 2525
New York, NY 10170
Phone: (212) 792-0048
Mobile: (301) 758-7351
Facsimile: (646) 786-3170
Email: Jason@levinepstein.com

The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error.
Thank you.

-----Original Message-----

From: Louis Leon <leon@cafaroeseq.com>
Sent: Wednesday, July 8, 2020 2:24 PM
To: Jason Mizrahi <Jason@levinepstein.com>
Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>
Subject: Re: Chinca v. Patel

Why do you need the extension of time?

Sincerely,
Louis M. Leon
Sent from my iPhone

> On Jul 8, 2020, at 2:08 PM, Jason Mizrahi <Jason@levinepstein.com> wrote:

>

> Louis,

>

> To clarify, we're seeking an extension to Wednesday (7/15).

>

>

> Jason Mizrahi, Esq.
> Levin-Epstein & Associates, P.C.
> 420 Lexington Ave., Suite 2525
> New York, NY 10170
> Phone: (212) 792-0048
> Mobile: (301) 758-7351

> Facsimile: (646) 786-3170
> Email: Jason@levinepstein.com
>
> The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error.
Thank you.
>
> -----Original Message-----
> From: Jason Mizrahi
> Sent: Wednesday, July 8, 2020 2:05 PM
> To: Louis Leon <lleon@cafaroeseq.com>
> Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>
> Subject: RE: Chinca v. Patel
>
> Hi Louis,
>
> I just tried your line but couldn't reach you.
>
> Can you please return my call? We'd like to request an extension of the July 10, 2020 Opposition Filing Deadline.
>
> Do you consent? Please let me know so I can inform the Court.
>
> Jason
>
>
> _____
> Jason Mizrahi, Esq.
> Levin-Epstein & Associates, P.C.
> 420 Lexington Ave., Suite 2525
> New York, NY 10170
> Phone: (212) 792-0048
> Mobile: (301) 758-7351
> Facsimile: (646) 786-3170
> Email: Jason@levinepstein.com
>
> The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error.
Thank you.
>
> -----Original Message-----
> From: Jason Mizrahi

> Sent: Thursday, June 25, 2020 10:15 AM
> To: Louis Leon <lleon@cafaroessq.com>
> Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>
> Subject: RE: Chinca v. Patel
>
> Louis,
>
> Good morning. July 10th is fine.
>
> We consent.
>
> Jason
>
> -----Original Message-----
> From: Louis Leon <lleon@cafaroessq.com>
> Sent: Wednesday, June 24, 2020 8:01 PM
> To: Jason Mizrahi <Jason@levinepstein.com>
> Cc: Joshua Levin-Epstein <Joshua@levinepstein.com>
> Subject: Re: Chinca v. Patel
>
> Jason:
>
> That doesn't really sound plausible. If we are asking for the motion deadline to be extended by five days, the opposition deadline should also be extended by five days only. That brings us to July 7. If you want, we would agree to extend the opposition deadline to July 10, but I don't think the judge will appreciate more than that. Please let me know ASAP.
>
> Sincerely,
> Louis M. Leon
> Sent from my iPhone
>
>> On Jun 24, 2020, at 6:15 PM, Jason Mizrahi <Jason@levinepstein.com> wrote:
>>
>> Louis,
>>
>> We are amenable to an extension of time to file the motions to 6/30, with oppositions being due on 7/21, in light of the 4th of July holiday.
>>
>> Jason
>>
>>>> On Jun 24, 2020, at 4:46 PM, Louis Leon <lleon@cafaroessq.com> wrote:
>>>



image001.jpg
4K